

UNITED STATES BANKRUPTCY  
COURT SOUTHERN DISTRICT OF  
NEW YORK

Chapter 11

In re:

Case No. 08-13555(JMP)

LEHMAN BROTHERS  
HOLDING, INC., et al.,  
Debtors

(Jointly Administered)

**DECLARATION OF JULIAN IRAGORRI IN RESPONSE TO DEBTORS' FORTIETH  
OMNIBUS OBJECTION TO CLAIMS (LATE-FILED CLAIMS)**

I, JULIAN IRAGORRI, declare under penalty of perjury, that the following is true and correct to  
the best of my knowledge, information and belief:

1. I make this declaration in response to Debtors' Fortieth Omnibus Objection to Claims  
(Late-Filed Claims), dated September 13, 2010.
2. I worked for Lehman Brothers for eight (8) years, until this bankruptcy was filed in 2008.  
I was employed at Lehman as Senior Vice President/Managing Director of European  
Equities.
3. I currently work for Barclay's Wealth. After Lehman filed bankruptcy, Barclay's bought  
the Lehman operations in the United States.
4. Starting on or about April 2009, I began receiving, literally, a bombardment of paperwork  
concerning the Lehman bankruptcy. Prior to this time, I had no experience with  
commercial or personal bankruptcy. I had never before made a claim against a debtor in  
a bankruptcy setting.

5. I received paperwork that said that if I owned common or preferred stock or warrants of or from Lehman Brothers I did not have to file a claim.
6. I received paperwork which set forth dates for filing claims, including papers that spoke of a "Bar Date" by which any required claims had to be filed. These documents made reference to a September 22, 2009 "General Bar Date" applicable to "general claims against Debtors" and to a "Program Securities Bar Date" (November 2, 2009) for claims based on securities "...included on the Lehman Program Securities list".
7. I had warrants with Lehman Brothers which I had purchased. I also had securities as part of my compensation at Lehman. Paperwork I saw caused me to believe that I did not have to file at all. I could not tell from the paperwork I saw whether, as a former employee claiming with respect to company securities which were part of my compensation, I would be required to file as a general claimant or as based on the Lehman Program Securities list.
8. I was in a new job. Speaking with former Lehman colleagues, I learned that some of them had filed claims based on securities which were part of their compensation.
9. I did not consult an attorney.
10. I prepared on my own a claim (attached) dated "9/21/09" which I did not file by the September 22, 2009 date for "general claims" because of my uncertainty as to whether or not it was a claim based on securities. I referenced the claim as being for "Wages, salaries and compensation". I did not check any place on the form in the box titled "Secured Claim".

11. I hand delivered the claim to Epiq Bankruptcy Solutions, along with an attachment titled "Executive Compensation Summary/Julian Iragorri ... Data as of September 12, 2008/Prepared on November 6, 2009" [see the last page of attached claim document].
12. Many months later, on or about September 13, 2010, I received notice that the Debtors by the "Fortieth Omnibus Objection to Claims" had included my claim for disallowance and dismissal based on untimely filing.
13. For the reasons stated herein and in accordance with the attached opposition by my attorneys, I respectfully object to the disallowance and expungement of my claim based on my justifiable confusion.

Dated: New York, New York October 18, 2010.

  
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Julian Iragorri